

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.,

Plaintiff,

12 Civ. 1596 (AKH)

v.

THE REPUBLIC OF CUBA,

Defendant,

v.

STANDARD CHARTERED BANK,

Garnishee.

**DECLARATION OF LUMA AL-SHIBIB IN SUPPORT OF
UNCONTESTED MOTION FOR ORDER CONCERNING
NOTICE TO AND SERVICE ON THIRD PARTIES
OF PLAINTIFF'S TURNOVER MOTION [D.I. 159]**

LUMA AL-SHIBIB declares, under penalty of perjury, as follows:

1. I am an attorney at the law firm of Anderson Kill & Olick, P.C., co-counsel for Plaintiff, Aldo Vera, Jr. (the "Plaintiff"), in the above-captioned action.
2. I make this declaration in support of the Uncontested Motion for Order Concerning Notice to and Service on Third Parties of Plaintiff's Turnover Motion [D.I. 159] filed contemporaneously herewith (the "Service Motion").
3. I am familiar with the proceedings in this litigation and make this Declaration based on my personal knowledge of the facts set forth herein.
4. At the time the Plaintiff filed its Motion for Turnover Order Pursuant to Federal Rule of Civil Procedure 69 and CPRL § 5225(b) [D.I. 159] (the "Turnover


Motion”), seeking turnover of blocked Accounts held by Garnishee, Standard Chartered Bank (“Garnishee”), Garnishee agreed not to contest the Turnover Motion as long as putative third parties who might claim an interest in the Blocked Assets were given notice of the motion and an adequate opportunity to respond or object thereto.

5. Pursuant to this agreement, the Plaintiff and Garnishee have since conferred and agreed on procedures to ensure that such third parties are given proper notice of the pending Turnover Motion and an opportunity to file responses or objections thereto.

6. These procedures for service and notice on third parties, to which both the Plaintiff and Garnishee consent, are set forth in the proposed Order attached as Exhibit “A” to the Uncontested Service Motion filed contemporaneously herewith.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
April 24, 2013



Luma S. Al-Shibib